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1 2 3 4 5	COLLEEN BAL (pro hac vice) cbal@wsgr.com BART E. VOLKMER (pro hac vice) bvolkmer@wsgr.com WILSON SONSINI GOODRICH & ROSAT 650 Page Mill Road Palo Alto, Ca 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 493-6811	KURT OPSAHL (pro hac vice) kurt@eff.org CORYNNE MCSHERRY (pro hac vice) corynne@eff.org ELECTRONIC FRONTIER FOUNDATION 454 Shotwell Street San Francisco, Ca 94110 Telephone: (415) 436-9333 Facsimile: (415) 436-9993		
6 7 8 9 10	CHAD BOWERS bowers@lawyer.com CHAD A. BOWERS, LTD Nevada State Bar No. 7283 3202 West Charleston Boulevard Las Vegas, Nevada 89102 Telephone: (702) 457-1001 Attorneys For Defendant & Counterclaimant THOMAS A. DIBIASE			
12 13 14	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
15 16 17 18 19 20 21 22 23 24 25 26 27	RIGHTHAVEN LLC, a Nevada limited-liability company, Plaintiff, v. THOMAS A. DIBIASE, an individual, Defendant. THOMAS A. DIBIASE, an individual, Counterclaimant, v. RIGHTHAVEN LLC, a Nevada limited-liability company, Counter-defendant.	CASE NO.: 2:10-cv-01343-RLH-PAL JOINT STIPULATION REGARDING CASE SCHEDULE		
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JOINT STIPULATION REGARDING CASE SCHEDULE

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WHEREAS, on December 16, 2010, the Court entered a stipulated joint discovery plan and scheduling order.

WHEREAS, the joint discovery plan and scheduling order provides that any stipulation or motion concerning extensions or modifications of the discovery plan and scheduling order must be made not later than May 19, 2011.

WHEREAS, the parties have meet and conferred regarding the current case schedule and agreed that given outstanding discovery issues and the pendency of Defendant-counterclaimant Thomas A DiBiase's motion to dismiss for lack of subject-matter jurisdiction, the scheduled deadlines in this case should be extended by approximately two months.

IT IS HEREBY STIPULATED AND AGREED:

The deadlines in this case shall be amended accordingly:

Event	Current Deadline	New Deadline
Fact Discovery Cut-off	June 8, 2011	August 12, 2011
Expert Disclosures	June 22, 2011	August 26, 2011
Rebuttal Expert Disclosures	July 1, 2011	September 7, 2011
Expert Discovery Cut-off	July 22, 2011	September 28, 2011
Dispositive Motions	August 21, 2011	October 26, 2011
Pre-trial Order	September 16, 2011	November 18, 2011
Interim Status Report	May 23, 2011	July 29, 2011

DATED: May 17, 2011

WILSON SONSINI GOODRICH & ROSATI SHAWN A. MANGANO, LTD.

By: /s/ Bart E. Volkmer
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Bart E. Volkmer, Esq.
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1 2 3 4	THE ELECTRONIC FRONTIER FOUNDATION Kurt Opsahl, Esq. Corynne McSherry, Esq. 454 Shotwell Street San Francisco, California 94110	Attorney for Plaintiff and Counter- Defendant Righthaven LLC
5	CHAD A. BOWERS, LTD. Chad A. Bowers, Esq.	
6 7	3202 West Charleston Boulevard Las Vegas, Nevada 89102	
8	Attorneys for Defendant and Counterclaimant Thomas A. DiBiase	
10		IT IS SO ORDERED:
11		II IS SO ORDERED.
12		June 1 Ven
13		UNITED STATES MAGISTRATE JUDGE
14		DATED:May 18, 2011
15		DATED.
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